

**REMARKS**

By this amendment, claims 21-24 have been amended and claims 25-31 have been newly added. Accordingly, claims 21-31 are currently pending in the application, of which claims 21 and 24 are independent claims.

In view of the above amendments and the following Remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

***Rejections Under 35 U.S.C. § 102***

Claims 21 and 24 stand rejected under 35 U.S.C. § 102(b) as being allegedly anticipated by U. S. Patent No. 6,717,634 issued to Kim, *et al.* (“Kim”). Applicants respectfully traverse this rejection for at least the following reasons.

Claim 21 recites “a conductive pattern connected to the data line and having a ladder shape”. An example of this claimed feature is shown in Fig. 4B of the present application, in which two storage electrodes 28 extending vertically at both sides of the pixel and storage electrode connection portion 27, each of which bridges two neighboring storage electrodes 28 of different pixels. The combination of the two storage electrodes 28 bridged by two storage electrode connection portion forms *a ladder shaped conductive pattern*, as claimed.

In this regard, the Examiner stated Kim shows “a ladder shaped conductive pattern (120) in contact with the data line (400) (see column 7, lines 42-50)” (Office Action, page 2). This assertion is respectfully disagreed with.

It is submitted that Kim fails to show a ladder shaped conductive pattern. The Examiner asserted that the repair line 120 of Kim is a ladder shaped. However, as shown in Fig. 15A, the repair line 120 does not have any physical configuration that would even remotely suggest that it looks like a ladder. Thus, it is submitted that Kim fails to disclose “a conductive pattern connected to the data line and having a ladder shape”, as claimed. Similarly, independent claim 24 recites “a conductive pattern connected to the data line and having a ladder shape”. As previously mentioned, Kim fails to disclose this claimed feature.

For this reason, it is submitted that claims 21 and 24 are patentable over Kim. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(b) rejection of claims 21 and 24.

#### ***Rejections Under 35 U.S.C. § 103***

Claims 22 and 23 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Kim. Applicants respectfully traverse this rejection for at least the following reasons.

Claims 22 and 23 are dependent from claim 21. As previously mentioned, claim 21 is believed to be patentable over Kim because, for example, Kim fails to disclose “a conductive pattern connected to the data line and having a ladder shape”. No secondary reference has been introduced to cure the deficiency from Kim. Thus, the subject matter of claim 21 would not have been obvious over Kim. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 22 and 23.

***Added Claims***

In this response, claims 25-31 have been newly added to cover several detailed features.

Claims 25-31 are dependent from claim 21. As previously mentioned, claim 21 is believed to be patentable over Kim. Thus, it is submitted that claims 25-31 would be also patentable.

***Other Matters***

In this response, claims 21-24 have been amended for better wording and to delete certain limitations that appear to be unnecessarily limiting the claim scopes. None of the amendments were made to narrow the claim scope or avoid the cited reference because, as mentioned above, the claimed invention is patentable over the cited reference.

**CONCLUSION**

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,



Hae-Chan Park  
Reg. No. 50,114

Date: August 19, 2004

**McGuireWoods LLP**  
1750 Tysons Boulevard  
Suite 1800  
McLean, VA 22102-4215  
Tel: 703-712-5365  
Fax: 703-712-5280  
HCP:WSC/gjb